

1 BILL LIETZKE
2 344 MONTGOMERY STREET, APT. 307
3 MONTGOMERY, ALABAMA 36104

R E C E I V E D
JAN 16 2015

Clerk, U.S. District Court
District of Montana
Great Falls Division

4
5 UNITED STATES DISTRICT COURT
6 MONTANA DISTRICT COURT

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8 BILL LIETZKE,) CASE NUMBER 4:14-CV-00096-BMM-RKS
9 PLAINTIFF,) CV-15-11-GF-BMM-JTJ
10 V.) LIBEL AND SLANDER
11 CITY OF MONTGOMERY, ET AL,)
12 TODD STRANGE, KEVIN MURPHY,)
13 DEFENDANTS.)

14 1. Jurisdiction founded on the existence of a federal question and amount
15 in controversy.

16 2. The action arises under the Constitution of the United States, Article
17 III, Section II, as hereinafter more fully appears.

18 3. The amount in controversy exceeds, exclusive of interests and costs,
19 the sum of \$1,000,000,000.00

20 4. On October 2, 2013, the Defendants Todd Strange and Kevin Murphy,
21 through City of Montgomery officers, Unlawfully detained the Plaintiff $\frac{1}{2}$ block
22 from Jefferson Davis Apartments, 344 Montgomery Street, Montgomery, Alabama
23 adjacent to Troy University School of Nursing, 340 Montgomery Street, Montgomery,
24 Alabama and alleged Troy University School of Nursing called the Defendants with
25 the false complaint and false report that the Plaintiff harassed Troy University
School of Nursing (Troy State University).

27 5. On October 2, 2013, City of Montgomery officers "Anderson," "Perry,"
28 "J.T.," and "Tim," and alleged third party Troy University School of Nursing
29 libeled and slandered the Plaintiff when the officers stated to the Plaintiff

1 that Troy University School of Nursing, 340 Montgomery Street, Montgomery,
2 Alabama "can take it in the wrong way" and stated to the Plaintiff Troy University
3 School of Nursing called the City of Montgomery, Et Al stating that the Plaintiff
4 was harassing Troy University School of Nursing.

5 6. On February 16, 2014, the Defendants Todd Strange and Kevin Murphy,
6 through an unidentified City of Montgomery officer, unlawfully detained the
7 Plaintiff 3 blocks from 344 Montgomery Street on Commerce Street and harassed
8 the Plaintiff from the window of the police car; first stating that officer Tim
9 was off for the day and second stating "Use the sidewalk, I don't you to get hit
10 . . ." The officer detained the Plaintiff on the public street of Commerce
11 Street, at a proximity where there was minimum traffic.

12 7. Said actions were precipitated with wanton negligence and recklessness
13 against the Plaintiff and caused the Plaintiff to suffer mental anguish,
14 defamation of the Plaintiff's character, and intentional infliction of emotional
15 distress.

16 8. On October 2, 2013, the Defendants Todd Strange and Kevin Murphy,
17 through City of Montgomery officers, procured the libel and slander against the
18 Plaintiff when the City of Montgomery officers Unlawfully detained the Plaintiff
19 at Jefferson Davis Apartments, 344 Montgomery Street and Troy University School
20 of Nursing, 340 Montgomery Street stating Troy University School of Nursing
21 called the City of Montgomery, Et Al with the false complaint and false report
22 that the Plaintiff harassed Troy University School of Nursing (Troy State
23 University) and stating "They (Troy University School of Nursing) can take it in
24 the wrong way.)

25 9. Officers "Anderson," "Perry," "J.T.," and "Tim" and alleged third party
26 Troy University School of Nursing libeled and slandered the Plaintiff after the
27 officers unlawfully detained the Plaintiff and stated that Troy University
28 School of Nursing called the Defendants alleging the Plaintiff was harassing Troy
29 University School of Nursing, and stated that "They can take it in the wrong way."

1 10. On February 16, 2014, the City of Montgomery, Et Al, an unidentified
2 white male police officer, detained the Plaintiff 3 blocks from 344 Montgomery
3 Street on Commerce Street in Montgomery, Alabama and harassed the Plaintiff
4 from the window of the police car, first stating that officer Tim was off for
5 the day, second stating "Use the sidewalk, I don't want you to get hit . . . "
6 The officer detained the Plaintiff on the public streets of Montgomery, and at
7 a proximity where there was minimum traffic.

8 11. On March 30, 2014, the City of Montgomery, Et Al, officer Anderson,
9 police officer, from October 2, 2013 City of Montgomery, Et Al incident of
10 libel and slander, detained the Plaintiff 3 blocks from 344 Montgomery Street
11 on Commerce Street in Montgomery, Alabama, first stating from the window of the
12 police car, "You're not bothering those people, are you?" and second stating
13 "You're not bothering those people, are you?" exiting the police car, and third
14 stating "They can take it in the wrong way" and fourth refusing to follow the
15 Plaintiff in the direction in which the Plaintiff's friends were going to meet
16 the Plaintiff's friends the officer falsely accused the Plaintiff of bothering.

17 12. On March 30, 2014, the City of Montgomery, Et Al, the Defendants Todd
18 Strange and Kevin Murphy through officer Anderson, libeled and slandered the
19 Plaintiff when the officer detained the Plaintiff 3 blocks from 344 Montgomery
20 Street on Commerce Street and stated the Plaintiff was "bothering those people"
21 who are acquainted with the Plaintiff, and who know the Plaintiff.

22 WHEREFORE, the Plaintiff is demanding the District of Nevada to enter
23 judgment against the City of Montgomery, Et Al for Irreparable Damages of
24 \$800,000,000.00, Exemplary Damages of \$800,000,000.00, Actual Damages of
25 \$800,000,000.00, Pecuniary Damages of \$800,000,000.00, Compensatory Damages of
26 \$800,000,000.00, and Punitive Damages of \$1,800,000,000.00

27 13. The Plaintiff's Complaint alleges that from October 2, 2013 to
28 March 30, 2014 the City of Montgomery, Et Al violated the Plaintiff's First
29 Amendment rights, Second Amendment rights, Third Amendment rights, Fourth

1 Amendment rights, Fifth Amendment rights, Sixth Amendment rights, and Seventh
2 Amendment rights of the United States Constitution detaining the Plaintiff
3 unlawfully, detaining the Plaintiff without probable cause, detaining the
4 Plaintiff on every single occasion on the public streets of Montgomery, detaining
5 the Plaintiff with false complaints and false reports on the public streets of
6 Montgomery, and detaining the Plaintiff alleging false accusations against the
7 Plaintiff on the public streets of Montgomery.

8 14. The Plaintiff's Complaint alleges that from October 2, 2013 to March
9 30, 2014 the City of Montgomery, Et Al libeled and slandered the Plaintiff with
10 the false complaint and false report that the Plaintiff harassed Troy University
11 School of Nursing, and stating the false accusation that the Plaintiff was
12 bothering those people, specifically people having conference with the Plaintiff
13 on Commerce Street in Montgomery who are acquainted with the Plaintiff, who are
14 friends with the People, and who personally know the Plaintiff.

15 15. Said actions were procured by the Defendants with wanton negligence
16 and recklessness therefor against the Plaintiff.

17 16. Intentional infliction of emotional distress, the defamation of the
18 Plaintiff's character, and the Plaintiff's mental anguish is the direct and
19 proximate result of the libel and slander of the City of Montgomery, Et Al.

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22 Respectfully submitted January 12, 2015

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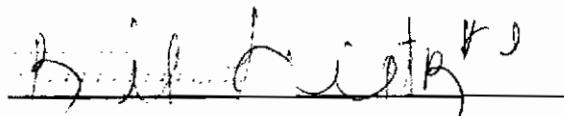
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344 Montgomery Street, Apt. 307